

PHILLIP A. TALBERT
United States Attorney
KAREN A. ESCOBAR
Assistant United States Attorney
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAULO ALFONSO PEREZ-MENDOZA,

Defendant.

CASE NO. 2:24-CR-00073 DJC

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: August 15, 2024

TIME: 9:00 a.m.

COURT: Hon. Daniel J. Calabretta

STIPULATION

1. By previous order, this matter was set for status on August 15, 2024.
2. By this stipulation, defendant now moves to continue the status conference until November 7, 2024, and to exclude time between August 15, 2024, and November 7, 2024, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes 17,022 Bates Stamped pages of material, including recordings and photographs. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
 - b) On April 11, 2024, the government has communicated a plea offer to the defendant.

1 c) Counsel for the defendant desires additional time to review the discovery
2 material, conduct further investigation, and consider the government's plea offer.

3 d) Counsel for defendants believe that failure to grant the above-requested
4 continuance would deny them the reasonable time necessary for effective preparation,]taking
5 into account the exercise of due diligence.

6 e) The government does not object to the continuance.

7 f) Based on the above-stated findings, the ends of justice served by continuing the
8 case as requested outweigh the interest of the public and the defendant in a trial within the
9 original date prescribed by the Speedy Trial Act.

10 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
11 et seq., within which trial must commence, the time period of August 15, 2024 to November 7,
12 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
13 T4] because it results from a continuance granted by the Court at defendant's request on the basis
14 of the Court's finding that the ends of justice served by taking such action outweigh the best
15 interest of the public and the defendant in a speedy trial.

16 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
17 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
18 must commence.

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1 IT IS SO STIPULATED.

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3 Dated: August 6, 2024

PHILLIP A. TALBERT
United States Attorney

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5 /s/ KAREN A. ESCOBAR
KAREN A. ESCOBAR
6 Assistant United States Attorney

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8 Dated: August 6, 2024

/s/ Meghan McLoughlin
Meghan McLoughlin
9 Counsel for Defendant
Paulo Alfonso Perez-Mendoza

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12 **ORDER**

13 IT IS SO FOUND AND ORDERED this 6th day of August, 2024.
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17 /s/ Daniel J. Calabretta
18 THE HONORABLE DANIEL J. CALABRETTA
19 UNITED STATES DISTRICT JUDGE
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